

# EXHIBIT 1

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11 *Counsel for Defendant Meta Platforms, Inc.*

12  
 13 **UNITED STATES DISTRICT COURT**  
 14 **NORTHERN DISTRICT OF CALIFORNIA**

15 RICHARD KADREY, et al.,  
 16 Individual and Representative Plaintiffs,  
 17 v.  
 18 META PLATFORMS, INC., a Delaware  
 corporation;  
 19  
 20 Defendant.

Case No. 3:23-cv-03417-VC

**DEFENDANT META PLATFORMS, INC.'S  
 OBJECTIONS AND RESPONSES TO  
 PLAINTIFFS' FIRST SET OF REQUESTS FOR  
 PRODUCTION**

Trial Date: None  
 Date Action Filed: July 7, 2023

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1 **PROPOUNDING PARTY:** **PLAINTIFFS RICHARD KADREY, SARAH SILVERMAN, CHRISTOPHER**  
 2 **GOLDEN, MICHAEL CHABON, TA-NEHISI COATES, JUNOT DÍAZ,**  
 3 **ANDREW SEAN GREER, DAVID HENRY HWANG, MATTHEW KLAM,**  
 4 **LAURA LIPPMAN, RACHEL LOUISE SNYDER, AYELET WALDMAN,**  
 5 **AND JACQUELINE WOODSON**

6 **RESPONDING PARTY:** **DEFENDANT META PLATFORMS, INC.**

7 **SET NUMBER: ONE** **ONE**

8 Pursuant to Federal Rules of Civil Procedure Rules 26 and 34, and Local Rule 34, Defendant  
 9 Meta Platforms, Inc. (“Meta”) responds as follows to Plaintiffs Richard Kadrey, Sarah Silverman,  
 10 Christopher Golden, Michael Chabon, Ta-Nehisi Coates, Junot Díaz, Andrew Sean Greer, David  
 11 Henry Hwang, Matthew Klam, Laura Lippman, Rachel Louise Snyder, Ayelet Waldman, and  
 Jacqueline Woodson’s (“Plaintiffs”) First Set of Requests for Production (“Requests”).

12 **I. RESPONSES TO ALL REQUESTS**

13 **1.** Meta’s responses to the Requests are made to the best of Meta’s present knowledge,  
 14 information, and belief. Said responses are at all times subject to such additional or different  
 15 information that discovery or further investigation may disclose, and Meta reserves the right to  
 16 amend, revise, correct, supplement, or clarify the responses and objections propounded herein.

17 **2.** Meta reserves the right to make any use of, or to introduce at any hearing and at  
 18 trial, documents responsive to the Requests but discovered subsequent to the date of Meta’s initial  
 19 production, including, but not limited to, any documents obtained in discovery herein.

20 **3.** To the extent that Meta agrees to produce documents in response to any Requests,  
 21 Meta will respond with responsive, non-privileged information currently in its possession, custody,  
 22 or control. Meta has no duty to produce or identify information outside of its possession, custody  
 23 or control. By stating in these responses that Meta will produce documents or is searching for  
 24 documents, Meta does not represent that any document actually exists, but rather that it will make  
 25 a good faith search and reasonable inquiry to ascertain whether documents responsive to these  
 26 Requests do, in fact, exist and to produce such documents if they are found to exist and are within  
 27 Meta’s possession, custody, or control.

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1       4. To the extent that Meta responds to a Request by stating that Meta will provide  
 2 documents that Meta deems to embody material that is private, business confidential, proprietary,  
 3 trade secret, or otherwise protected from disclosure pursuant to Federal Rule of Civil Procedure  
 4 26(c) and/or Federal Rule of Evidence 501, Meta will only do so subject to the parties' stipulated  
 5 protective order governing the unauthorized use or disclosure of such information or documents  
 6 with a designated "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL - ATTORNEYS' EYES  
 7 ONLY" or "HIGHLY CONFIDENTIAL - SOURCE CODE" distinction (ECF No. 90, the  
 8 "Protective Order").

9       5. The provision of a response to any of these Requests does not constitute a waiver of  
 10 any objection regarding the use of said response in these proceedings. Meta reserves all objections  
 11 or other questions as to the competency, relevance, materiality, privilege or admissibility as  
 12 evidence in any subsequent proceeding in or trial of this or any other action for any purpose  
 13 whatsoever of this response and any document or thing produced in response to the Requests.

14       6. Meta reserves the right to object on any ground and at any time to such other or  
 15 supplemental requests for production that Plaintiffs may propound involving or relating to the  
 16 subject matter of these Requests.

17       7. Unless otherwise stipulated in a production protocol or ordered by the Court, Meta  
 18 will produce each document in response to these Requests in a form in which it is ordinarily  
 19 maintained or in a reasonably usable form.

20 **II. OBJECTIONS TO INSTRUCTIONS AND DEFINITIONS**

21       Whether or not separately set forth in response to each Request, Meta makes these  
 22 objections to the following Instructions and Definitions.

23       1. Meta objects to the definition of "Agreement" as overbroad and unduly burdensome  
 24 to the extent that it encompasses oral contracts, arrangements, or understandings, including those  
 25 that are informal. Meta further objects to the definition of "Agreement" as vague, ambiguous, and  
 26 unintelligible as to the term "modifications" to the extent it is intended to mean something distinct  
 27 from "versions" or "amendments." Meta will construe "Agreement" to mean written contracts,  
 28 including drafts, versions, amendments, exhibits, and appendices thereof.

1 attached thereto. In the context of this Request, Meta will construe this phrase to mean documents,  
 2 other than those subject to the procedure for requesting electronic communications under the ESI  
 3 Order.

4 Meta objects to this Request because, on its face, it does not exclude documents and  
 5 communications exchanged with or at the direction of Meta's attorneys concerning legal advice or  
 6 opinions, which are subject to attorney-client privilege and/or attorney work product doctrine. Such  
 7 documents will not be produced.

8 Meta objects to this Request as overbroad, unduly burdensome, and disproportionate to the  
 9 needs of the case as it seeks “[a]ll” documents concerning the subject matter of the Request,  
 10 including documents with limited, if any, relevance to Plaintiffs' copyright infringement allegations  
 11 and Meta's defenses thereto.

12 Subject to and without waiving the foregoing objections, and pursuant to the terms of the  
 13 Protective Order and ESI Order, Meta will conduct a reasonable search for and produce non-  
 14 privileged, relevant documents in its possession, custody, or control sufficient to show the  
 15 individuals granted or denied access to Llama 1 and Llama 2. Any such production shall be on a  
 16 rolling basis, and the timing of any such production shall be governed by terms of the Scheduling  
 17 Order (ECF No. 87).

18 Dated: February 23, 2024

COOLEY LLP

20 By: /s/ Judd Lauter  
 21 Judd Lauter  
 22 Bobby Ghajar  
 23 Mark Weinstein  
 24 Kathleen Hartnett  
 25 Colette Ghazarian

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## PROOF OF SERVICE

I am a citizen of the United States and a resident of the State of California. I am employed in Santa Clara County, State of California, in the office of a member of the bar of this Court, at whose direction the service was made. I am over the age of eighteen years, and not a party to the within action. My business address is Cooley LLP, 3175 Hanover Street, Palo Alto, California 94304-1130. On the date set forth below I served the documents described below in the manner described below:

• **DEFENDANT META PLATFORMS, INC.'S OBJECTIONS AND RESPONSES TO PLAINTIFFS' FIRST SET OF REQUESTS FOR PRODUCTION**

(BY ELECTRONIC MAIL) I am personally and readily familiar with the business practice of Cooley LLP for the preparation and processing of documents in portable document format (PDF) for e-mailing, and I caused said documents to be prepared in PDF and then served by electronic mail to the parties listed below.

on the following part(ies) in this action:

Executed on February 23, 2024, at Palo Alto, California.

Jessica G. Alvarez-Lopez

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